

1 2 3 4 5	COOLEY GODWARD KRONISH LLP JOHN C. DWYER (136533) (dwyerjc@cooley.com) GRANT P. FONDO (181530) (gfondo@cooley.com) AARON F. OLSEN (224947) (aolsen@cooley.com) Five Palo Alto Square 3000 El Camino Real Palo Alto, CA 94306-2155 Telephone: (650) 843-5000 Facsimile: (650) 857-0663	
6 7	Attorneys for Nominal Defendant SILICON STORAGE TECHNOLOGY, INC.	
8	UNITED STATES DISTRICT COURT	
9	NORTHERN DISTRICT OF CALIFORNIA	
10 11 12 13	In re SILICON STORAGE TECHNOLOGY, INC., DERIVATIVE LITIGATION	Master File No. C06-04310 JF STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO FILE RESPONSIVE PLEADINGS
14	This Document Relates To:	Trial Date: None
15	ALL ACTIONS.	
16	WHEREAS, On May 9, 2008, Lead Plaintiffs filed their Second Amended Complaint;	
17	WHEREAS, Lead Plaintiffs, nominal defendant Silicon Storage Technology, Inc. ("SST")	
18	the individual defendants, and the parties in the related state action, Alex Chuzhoy v. Bing Yeh, et	
19	al., Santa Clara Case No. 106CV074026, (the "Parties") all met in Palo Alto, California on	
20	May 20, 2008 to participate in an all day settlement meeting in order for the Company to share	
21	information with plaintiffs relating to the audit committee chair's investigation and findings and	
22	the filing of the Company's restatement and to discuss the settlement of the derivative litigation;	
23	WHEREAS, the Parties and representatives of SST's insurance carriers participated in an	
24	all day mediation with the Hon. William Cahill on July 31, 2008;	
25	WHEREAS, the Parties and representatives of SST's insurance carriers are currently	
26	engaging in further settlement discussions with the assistance of the Hon. William Cahill;	
27	WHEREAS, pursuant to the Order dated August 22, 2008, Defendants response to the	
28	Second Amended Complaint is due on October	5, 2008;

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1 WHEREAS, due to the prior and current settlement discussions, and the parties' focus 2 thereon, Defendants have requested and Lead Plaintiffs consent to an extension of two weeks for 3 which defendants to file a response to the Second Amended Complaint; 4 WHEREAS, subject to the Court's approval, the parties stipulate as follows: 5 1. Defendants shall file and serve answers or otherwise respond to the Amended 6 Complaint by October 17, 2008. In the event that Defendants file and serve any motion to 7 dismiss or other motion directed at the Amended Complaint, Lead Plaintiffs shall file and serve 8 an opposition by December 5, 2008. If Defendants file and serve a reply to Lead Plaintiffs' 9 opposition, they will do so by January 7, 2008. The hearing on Defendants' motion to dismiss or 10 other responsive pleading shall be January 16, 2009 or other date as ordered by the Court. 2. 11 By executing this Stipulation, the parties have not waived and expressly retain all 12 claims, defenses and arguments whether procedural, substantive or otherwise. This stipulation is 13 without prejudice to any subsequent motion to stay this action, or any objections or defenses 14 thereto, and this Order is entered without prejudice to the rights of any party to apply for a modification of this Order. 15 16 Dated: September 30, 2008 COOLEY GODWARD KRONISH LLP 17 18 19 20 Attorneys for Nominal Defendant SILICON STORAGE TECHNOLOGY, INC 21 Dated: September 30, 2008 SCHIFFRIN BARROWAY TOPAZ & KESSLER, LLP 22 23 /s/ Nichole Browning 24 25 Co-Lead Counsel for Lead Plaintiffs 26 27 28

2.

COOLEY GODWARD LLP
ATTORNEYS AT LAW
PALO ALTO

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1	FILER'S ATTESTATION		
2	I, Grant P. Fondo, am the ECF User whose ID and password are being used to file this		
3	Stipulation and [Proposed] Order to Extend Time to File Responsive Pleading. In compliance		
4	with General Order 45.X.B., I hereby attest that all parties have concurred in this filing.		
5			
6	DATED: September 30, 2008 COOLEY GODWARD KRONISH LLP		
7	ENTED: September 30, 2000 COOLLY GOD WARD KKONSH ELI		
8			
9	By: Grant P. Fondo		
10	Grant F. Polido		
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12			
13	ORDER		
14	PURSUANT TO STIPULATION AND FOR GOOD CAUSE SHOWN HEREIN, IT I		
15	SO ORDERED.		
16	10/2/20		
17	DATED: 10/2/08 Judge of the U.S. District Court		
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